

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**ALEJANDRO GIL and MANUEL
HERNANDEZ**, on behalf of themselves and
**all other persons similarly situated, known
and unknown,**

Plaintiffs,

v.

TRUE WORLD FOODS CHICAGO, LLC,

Defendant.

Case No. _____

DECLARATION OF XUEKAN GU

I, Xuekan Gu, state and affirm as follows based on my personal knowledge:

1. My name is Xuekan Gu. I am over the age of 18 years and otherwise competent to give testimony. I have personal knowledge of the matters set forth in this Declaration.

2. I am the General Manager of True World Foods Chicago, LLC (“TWF”). I am authorized to submit this Declaration on behalf of TWF.

3. As part of my job, I am familiar with and have access to information regarding TWF and its current and former employees, including the type of timekeeping system such employees used, and the collective bargaining agreement they were employed under, as applicable.

4. Plaintiff Alejandro Gil was employed by TWF as a driver from 2005 to 2017.

5. Plaintiff Manuel Hernandez (collectively with Gil, “Plaintiffs”) was employed by TWF as a driver from 2001 to 2018.

6. Within the five years preceding the filing of Plaintiffs' Complaint, TWF was a party to a collective bargaining agreement ("CBA") with Teamsters Local 710 (the "Union").

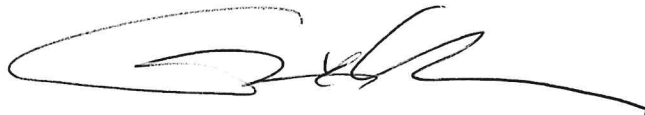
7. During their employment with TWF, Plaintiffs were members of the Union. Therefore, the CBA governed the terms and conditions of Plaintiffs' employment with TWF.

8. Among other things, in the CBA, the Union agreed to arbitrate grievances and disputes involving the interpretation and application of the Agreement.

THE DECLARANT STATES NOTHING FURTHER.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 15, 2020

A handwritten signature in black ink, appearing to be 'Xuekan Gu', written over a horizontal line.

Xuekan Gu